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*Attorneys for Defendants Tesla, Inc., Elon Musk,
Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,
Antonio J. Gracias, James Murdoch, Kimbal Musk,
And Linda Johnson Rice*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**JOINT STIPULATION REGARDING COURT
ORDER NO. 387**

Pursuant to this Court's Order (Dkt. No. 419), Lead Plaintiff Glen Littleton ("Plaintiff") and Defendants Tesla, Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, "Defendants") (collectively, Plaintiff and Defendants are referred to as the "Parties"), by and through their undersigned counsel of record, submit the following joint stipulation:

1 WHEREAS, Plaintiff moved for Partial Summary Judgment on January 11, 2022 (Dkt. No.
2 352);

3 WHEREAS, as this Court noted in its Order Granting In Part and Denying In Part Plaintiff
4 Littleton's Motion For Partial Summary Judgment (Dkt. No. 387), Defendants made several
5 requests to seal in conjunction with the summary judgment briefing;

6 WHEREAS, the Court denied Tesla's requests to seal without prejudice (Dkt. No. 387),
7 directing Defendants to refile a Motion to Seal if the Parties could not agree on which materials
8 should remain sealed;

9 WHEREAS, the Parties could not come to an agreement, and Defendants accordingly filed
10 a Renewed Motion to Seal (Dkt. No. 405);

11 WHEREAS, Defendants' Renewed Motion to Seal (Dkt. No. 405) did not request to seal
12 any portion the Court's Order Granting In Part and Denying In Part Plaintiff Littleton's Motion For
13 Partial Summary Judgment (Dkt. No. 387);

14 WHEREAS, on May 9, 2022, the Court ordered the Parties to meet and confer on what
15 portions of the Court's Order Granting In Part and Denying In Part Plaintiff Littleton's Motion For
16 Partial Summary Judgment (Dkt. No. 387) should be sealed (Dkt. No. 419);

17 WHEREAS, the Parties agree that no portion of the Court's Order Granting In Part and
18 Denying In Part Plaintiff Littleton's Motion For Partial Summary Judgment (Dkt. No. 387) needs
19 to be sealed;

20 NOW, THEREFORE, the Parties hereby submit their agreement that no portion of Court's
21 Order Granting In Part and Denying In Part Plaintiff Littleton's Motion For Partial Summary
22 Judgment (Dkt. No. 387) need be permanently sealed.

23
24 DATED: May 10, 2022

LEVI & KORSINSKY, LLP

25 By: /s/ Nicholas I. Porritt

26 Nicholas I. Porritt (*appearing pro hac vice*)
27 Attorneys for Lead Plaintiff Glen Littleton and Lead
28 Counsel for the Class

1 DATED: May 10, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 By: /s/ Alex Spiro

3 *Alex Spiro (appearing pro hac vice)*
4 *Attorneys for Tesla, Inc., Elon Musk, Brad W. Buss,*
5 *Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias,*
6 *James Murdoch, Kimbal Musk, And Linda Johnson Rice*

7 **ATTESTATION**

8 I, Jeanine Zalduendo, am the ECF user whose ID and password are being used to file the
9 above document. In compliance with Local Rule 5-1(h)(3), I hereby attest that Alex Spiro and
10 Nicholas Porritt have concurred in the filing of the above document.

11 /s/ Jeanine Zalduendo

12 Jeanine Zalduendo